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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Light 05000261
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 VARGA, S. A. Assistant Director for Operating Reactors

SUBJECT: Advises that interim remedial actions will be taken re engineered safeguards bypass & reset commitments prior to resumption of facility operation. Revised responses will be provided by 810930.

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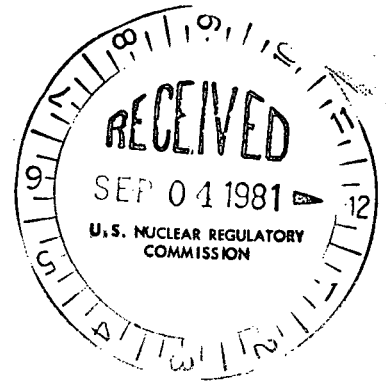
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Carolina Power & Light Company

H. B. ROBINSON STEAM ELECTRIC PLANT
Post Office Box 790
Hartsville, South Carolina 29550



AUG 29 1981

Robinson File No: 2-B-13-b

Serial: RSEP/81-1513

Mr. S. A. Varga, Chief
Operating Reactors Branch
Office of Nuclear Regulatory Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
ENGINEERED SAFEGUARDS BYPASS/RESET COMMITMENTS

Dear Mr. Varga:

Recent discussions between your staff and H. B. Robinson (HBR) personnel have identified concerns with respect to Engineered Safeguards automatic and manual actuation. It has been determined that for the following systems, Containment Ventilation Isolation, Containment Isolation Phase A, Containment Isolation Phase B, Containment Spray, and Feedwater Isolation, if the reset button is engaged while an actuation signal is present no other automatic or manual signals can re-initiate system action. However, each piece of equipment can be operated by the individual controls on the control board. Due to the two minute delay in the Safety Injection (SI) reset circuit this concern is not applicable to the SI reset button.

Based on the above identified concern of inhibiting a second initiating signal to Containment Ventilation Isolation, Containment Isolation Phase A, Containment Isolation Phase B, Containment Spray and Feedwater Isolation by engaging the system reset button, the following interim remedial actions will be taken prior to returning H. B. Robinson Unit #2 to power operation:

1. Standing Order No. 15 has been developed and approved which prohibits use of the Containment Ventilation Isolation, Containment Isolation Phase A, Containment Isolation Phase B, Containment Spray, and Feedwater Isolation reset buttons when an initiating signal is present. This standing order also describes what happens if the reset button is engaged with an initiating signal present and what actions are required to operate the equipment which could be locked out. Standing Order No. 15 also states that if a condition should arise such that one of the effected reset

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buttons is required, a 10CFR50.59 evaluation will be performed and NRC approval will be obtained as appropriate to the circumstance. CP&L has reviewed each of the effected systems and has determined that the likelihood of a continuous spurious signal which would require use of the reset button is very small. This determination is supported by past operating experience.

2. Standing Order No. 15 will be reviewed in detail by each operating shift before they are permitted to operate the Unit at power. This review will stress what actions occur if a reset button is engaged with the initiating signal present and what subsequent operator actions are required. The review will also emphasize that Standing Order No. 15 does not include the SI reset button.
3. A cover has been installed over the Containment Ventilation Isolation, Containment Isolation Phase A, Containment Isolation Phase B, Containment Spray, and Feedwater Isolation reset buttons. The cover consists of a flapper which must be lifted before the buttons can be engaged. This will prevent inadvertent actuation of each effected reset button and will require the operator to make an additional deliberate action as a reminder of the items covered in Standing Order No. 15.

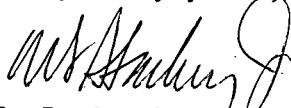
In addition to the above completed interim actions CP&L commits to the design and installation of a long term solution to the ESF Bypass concern prior to resumption of power operation after the next scheduled outage. (This outage is expected to occur within 119 calendar days of power operation). The long term solution will ensure that automatic SI and manual signals to the Containment Ventilation Isolation, Containment Isolation Phase A, Containment Isolation Phase B, Containment Spray, and Feedwater Isolation Systems will not be inhibited when another signal is present and blocked, reset or overridden.

An initial review of prior CP&L responses on this issue has shown that some of the responses have not adequately addressed all of your concerns. These previous responses had been made assuming that blockage of the initial actuation signal was the only concern. Since this assumption was apparently incorrect, CP&L will provide revised responses by September 30, 1981.

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If you have any questions concerning our actions, please contact me.

Very truly yours,



R. B. Starkey, Jr.
General Manager

H. B. Robinson S.E. Plant

FMG/as

cc: J. P. O'Reilly
W. J. Ross